

DEBORAH PEOPLES, MARYELLEN HICKS,	§	IN THE DISTRICT COURT
KATHLEEN HICKS And CAMILLE	§	
RODRIGUEZ	§	
Plaintiffs,	§	
	§	
v.	§	TARRANT COUNTY, TEXAS,
	§	
TIM OHARE, MATT KRAUS, MANNY	§	
RAMIREZ and CLINTON LUDWIG, in their	§	
official capacities; and	§	
TARRANT COUNTY, TEXAS	§	
Defendants.	§	JUDICIAL DISTRICT

Plaintiffs Deborah People, Maryellen Hicks, Kathleen Hicks and Camille Rodriguez file this Original Petition against Defendants, and would respectfully show the Court as follows:

1. Plaintiffs complain of Defendants and request a temporary restraining order, temporary injunction, declaratory judgment, and permanent injunction. They plead solely under Texas law and seek prospective relief concerning Election Day voting access for the November 3, 2026 general election. No plaintiff seeks monetary damages.

2. On September 1, 2026, the Tarrant County Commissioners Court (through Defendants O'Hare, Kraus, Ramirez and Ludwig) approved a plan reported to provide 224 countywide Election Day voting sites, reducing the total number in the previous election by a net 92 voting sites. Such action was enacted with the intent of discouraging and providing obstacles to racial minority voters and has the purpose and effect of eliminating votes by racial minorities, including but not limited to Black and Hispanic voters. Plaintiffs challenge the placement and cumulative effects of sites on identifiable voters. They allege that the plan burdens qualified voters in certain

areas, intentionally treats Black and Hispanic voters unequally, and/or disenfranchises voters in general. Each theory is pleaded separately and, where appropriate, in the alternative.

II. DISCOVERY CONTROL PLAN

3. Plaintiffs intend that discovery be conducted under Level 2 of Texas Rule of Civil Procedure 190.

III. PARTIES

4. Plaintiff Maryellen Hicks is a Black registered Tarrant County voter who sues in her individual capacity. She asserts standing based on her voting injury as described further herein related to the disenfranchising of voters in general, disenfranchising of Democratic voters and disenfranchising of Black voters.

5. Plaintiff Deborah Peoples is a Black registered Tarrant County voter who sues in her individual capacity. She asserts standing based on her voting injury as described further herein related to the disenfranchising of voters in general, disenfranchising of Democratic voters and disenfranchising of Black voters.

6. Plaintiff Kathleen Hicks is a Black registered Tarrant County voter who sues in her individual capacity. She asserts standing based on her voting injury as described further herein related to the disenfranchising of voters in general, disenfranchising of Democratic voters and disenfranchising of Black voters.

7. Plaintiff Camille Rodriguez is a Hispanic registered Tarrant County voter who sues in her individual capacity. She asserts standing based on her voting injury as described further herein related to the disenfranchising of voters in general, disenfranchising of Democratic voters and disenfranchising of Hispanic voters.

8. Defendant Tarrant County is a governmental entity. Defendant may be served through its county judge Tim O'Hare who can be served at 100 East Weatherford St., Ste. 501, Fort Worth, TX 76196.

9. Defendant Tim O'Hare is an individual and the county judge for Tarrant county. He may be served at 100 East Weatherford St., Ste. 501, Fort Worth, TX 76196.

10. Defendant Matt Kraus is an individual and commissioner for Tarrant County who may be served at 645 Grapevine Highway, Hurst, TX 76074 and/or Southlake Town Hall, 1400 Main St., Southlake, TX 76092.

11. Defendant Manny Ramirez is an individual and commissioner for Tarrant County who may be served at 6713 Telephone Rd., Ste. 301, Lake Worth, TX 76135.

12. Defendant Clinton Ludwig is an individual and the Elections Administrator for Tarrant county who may be served at 2700 Premier St., Fort Worth, TX 76111.

IV. JURISDICTION AND VENUE

13. This Court has subject-matter jurisdiction over claims for prospective equitable relief for alleged violations of the Texas Constitution and under Texas Election Code § 273.081. Tex. Const. art. V, § 8; Claims compelling officials to exercise authority within constitutional or statutory limits are pleaded against those officials in their official capacities.

14. Venue is mandatory in Tarrant County for an action against the County. Tex. Civ. Prac. & Rem. Code § 15.015. The challenged action occurred and will be implemented here.

15. Plaintiffs assert independent state-law claims under Texas Constitution article I, §§ 3, 3a, 8, 19, 27, and 29, and article VI, § 2. Plaintiffs invoke Chapter 37 of the Civil Practice and Remedies Code for appropriate declarations ancillary to otherwise justiciable claims. No federal cause of action is asserted in this petition.

V. ELIMINATION OF VOTER ACCESS

16. Tarrant County has a population which is approximately 40% white, 31% Hispanic and Latino, 19% Black and 7% Asian, the 2025 U.S. Census numbers show. The County is eliminating nearly a third of the polling locations in Tarrant County, and that means on election day there will be longer commutes, longer lines and lower voter turnout, especially in the County's Black and Hispanic communities. Such action has the purpose and effect of making voting more difficult for Black and Hispanic voters.

17. Tarrant County has used countywide Election Day voting centers. Under Election Code § 43.007, a qualified voter may use a participating countywide site; the statutory program permits elimination of individual precinct polling places but imposes requirements concerning site numbers, commissioner-precinct distribution, and adoption of a location methodology. A countywide system does not eliminate the need to evaluate voters' practical ability to reach and use available sites or assess the effect of elimination on disenfranchising voters.

18. Tarrant County has eliminated over 92 polling sites for the 2026 mid-term elections, cutting voter access in a manner that disproportionately harms minorities and disenfranchises the electorate.

19. Plaintiffs compared the final September 2, 2026 Election Day list against the County's published Vote Center methodology and both the County's official November 2022 Election Day location totals and November 2024 Election Day location totals. There is an important issue to note at the outset. "92 eliminated polling places" is not the same thing as 92 specific 2022 locations being closed. The County went from 316 Election Day locations in 2022 to 224 in the final 2026 list—a net reduction of 92—but the 2026 list contains a substantial number of new locations that

were not used in 2022. Therefore, the number of 2022 locations actually removed is greater than 92.

20. There are 46 former polling locations that appear to have been removed even though more than 500 voters used them on Election Day in November 2022. That directly conflicts with the plain language of the County's methodology, which says that locations where “more than 500 votes were cast on election day will be placed on the keep list.”

21. The 46 apparent >500 “Keep List” locations that disappeared:

2022 polling location	2022 Election Day voters
The Villages of Woodland Springs Amenity Center	2,169
Colleyville Public Library	2,113
Golden Triangle Branch Library	1,513
Center for Community Service / Junior League of Arlington	1,390
Grace Church	1,246
Kennedale Community Center	1,160
Destiny Center	1,100
Eagle Mountain Fire Hall 1	1,096
Congregation Ahavath Sholom	1,084
International Newcomer Academy	1,015
Tanglewood Elementary School	966
Blue Mound City Hall	968
Lone Star Elementary School	954
St. Francis Catholic Church	822
Sendera Ranch Rancho Canyon Clubhouse	822
Southside Community Center	800
Blue Haze Elementary School	788
Grace Baptist Church	732
McLean 6th Grade School	725
North Park Baptist Church	700
Hillwood Middle School	675
New Day Church	673
Northeast Branch Library — Arlington	660
Carroll Senior High School	654
Fire Station Community Center	651
Dove Elementary School	645

2022 polling location	2022 Election Day voters
Southwest Branch Library — Arlington	641
Crossmark Church	637
Jason B. Little Elementary School	631
Ruth Ditto Elementary School	629
First Baptist Church of Crowley	625
Fort Worth Presbyterian Church	623
First Baptist Hurst at the Trails	622
St. Stephen Presbyterian Church	607
Central Bible Church — The Connection	600
Roberta Tipps Elementary School	585
Covenant Church	583
Connell Baptist Church	579
Park Glen Elementary School	577
Country Inn & Suites	575
Agape Baptist Church	572
Trinity Chapel	537
Grace Lutheran Church	537
R. F. Patterson Elementary School	521
River Oaks United Methodist Church	515
Berta May Pope Elementary School	505

22. Those figures come from Tarrant County's own Election Day Location Count Totals. The County reported 180,249 Election Day voters countywide in 2022. The County's asserted reasons for eliminating these voting locations are further evidence of discriminatory intent because the evidence demonstrates that those explanations are pretextual. The County adopted or invoked objective criteria that purportedly governed which Election Day locations would be retained, including a mandatory "keep" criterion based on prior Election Day turnout, yet eliminated locations satisfying that criterion without the justification its own methodology required. The County's failure to follow the criteria it represented would govern the selection process permits the inference that those criteria were not the actual reasons for the County's decisions. The falsity,

inconsistency, or unexplained abandonment of the County's stated reasons is circumstantial evidence from which discriminatory purpose may be inferred.

23. The procedural irregularities are particularly significant because they concern requirements imposed by law, not merely discretionary internal practices. Election Code § 43.007 requires the Commissioners Court to formally adopt a methodology governing the location of countywide polling places and, in adopting that methodology, to solicit input from organizations or persons representing minority voters. The County's failure to comply with these mandatory statutory protections constitutes an independent violation of the Election Code and is also probative circumstantial evidence of discriminatory intent when considered together with the racial impact of the site reductions, the locations selected for elimination, the County's departures from its stated selection criteria, and the absence of contemporaneous explanations for those departures.

24. These departures are not isolated technical deficiencies. The statutory methodology and minority-input requirements are safeguards governing the very decision-making process through which polling locations are selected and eliminated. The County cannot rely upon its purported methodology as a race-neutral explanation for its decisions while disregarding that methodology when its mandatory criteria favor retention of particular voting locations. Nor can the County rely upon the legitimacy of its site-selection process while failing to follow statutory procedures requiring formal adoption of the methodology and participation by representatives of minority voters. Taken together, the County's departures from mandatory procedures, its departures from its own stated criteria, the lack of required justification for those departures, and the resulting burden on predominantly Black and Hispanic communities support a reasonable inference that the County's asserted neutral explanations are pretextual and that race was a motivating factor in the challenged decisions.

25. This isn't merely a comparison showing that high-use locations were removed. The County's written rule uses mandatory language: "Locations where more than 500 votes were cast on election day will be placed on the keep list." The same section says the relevant election is the last even-year November election, which for the 2026 decision was November 2024 if the methodology was updated literally at the time of decision, although the County and public discussion have repeatedly used the 2022 midterm as the comparison baseline for the 2026 midterm.

26. Furthermore, the County's purported methodology says that when its rules generate conflicting recommendations, the Elections Administrator may exercise discretion, but the decision "must be accompanied by a justification" when the recommendation is presented to Commissioners Court. The County has provided no countervailing criterion to overcome the >500-voter "keep" designation, and no written or stated justification required by the methodology.

27. The minority criteria create another layer. The methodology provides that precincts with large minority populations are more likely to retain an in-precinct location; and locations should be retained where households with one or zero vehicles exceed 35%, under the methodology's specified transportation circumstances.

28. Using 2024 polling data also shows the failure of the County to follow its own published methodology.

Matrix 2024						
Location	Address	2022 turnout	2024 turnout	>500 Keep?	Minority % (est.)	Facility type
Kennedale Community Center	316 West 3rd Street, Kennedale, TX 76060	1160	760	YES	~45-55%	Public / community center
Golden Triangle Branch Library		1513	1508	YES	~45-55%	Public / library

Destiny Center		1100	607	YES	~55-65%	Private / church or community facility (verify)
Lone Star Elementary School		954	613	YES	~55-65%	School
Blue Haze Elementary School		788	726	YES	~55-65%	School
Tanglewood Elementary School		966	598	YES	~20-30%	School
Dove Elementary School	1932 Dove Road, Grapevine, TX 76051	645	502	YES	~25-35%	School
Roberta Tipps Elementary School	3001 North Walnut Creek Drive, Mansfield, TX 76063	585	501	YES	~45-55%	School
Southside Community Center		800	666	YES	~75-85%	Public / community center
Former Bursey Road Senior Adult Center			512	YES	~35-45%	Public / senior center (verify)
Fort Worth Presbyterian Church		623	499	No	~40-50%	Private / church
First Baptist Hurst at the Trails	9208 Trammel Davis Road, Fort Worth, TX 76118	622	282	No	~50-60%	Private / church

29. Voters in the 76103 zip code are 78.7% non-white, with 76% being Black or Hispanic. In 2022, that zip code had three polling locations where 892 votes were cast. The three locations were at Christ Catholic Church, Sagamore Hill Elementary School and Victory Temple Worship Center. The next closest polling location to Christ Catholic Church is over a mile away. The next closest polling location to Sagamore Hill Elementary School is .85 mile away. The next closest polling location to Victory Temple Worship Center is also .85 mile away. All three polling locations have been eliminated.

30. Voters in the 76115 zip code are 89.3% non-white, with 82.7% being Black or Hispanic. The County is eliminating 4 out of 5 polling sites in this zip code, despite there being 1,171 votes cast in 2022, putting a 300% increase in pressure on the remaining site with accompanying longer lines, longer commutes and lower voter turnout. Voters in the following zip codes have also had

their polling cites eliminated: 76104 five locations eliminated (78.7% non-white, 74.6% Black or Hispanic); 76119 six locations eliminated (92% non-white, 87.5% Black or Hispanic); 76164 two locations eliminated (95% non-white, 94.19 % Black or Hispanic); 76010 five locations eliminated (85.4% nonwhite; 76.9% Black or Hispanic); 76111 four locations eliminated (75.7% nonwhite, 71.0% Black or Hispanic); 76112 six locations eliminated (78.7% nonwhite, 73.2% Black or Hispanic); 76040 two locations eliminated (68.8% nonwhite, 46.4% Black or Hispanic); 76134 three locations eliminated (80.7% nonwhite, 74.7% Black or Hispanic); 76105 two locations eliminated (93.6% nonwhite, 92.3% Black or Hispanic); 76110 four locations eliminated (69.5% nonwhite, 66.1% Black or Hispanic); 76063 three locations eliminated (48.4% nonwhite, 39.8% Black or Hispanic); 76123 two locations eliminated (76.2% nonwhite, 63.4% Black or Hispanic); 76114 two locations eliminated (65.3% nonwhite, 63.3% Black or Hispanic); 76117 two locations eliminated (62.1% nonwhite, 52.5% Black or Hispanic); 75052 one location eliminated (80.7% nonwhite, 69.8% Black or Hispanic); 76133 one location eliminated (66.4% nonwhite, 60.3% Black or Hispanic).

31. The County has also added polling locations in areas with substantially lower minority populations, including ZIP Codes 76262 and 76177. County officials have justified the distribution of additional polling places in part by asserting a need to “balance” the four Commissioner precincts. That asserted justification must be considered in light of the County's own actions in redrawing those very precincts only one year earlier. In June 2025, the Commissioners Court adopted Map 7, which substantially altered the racial composition of Commissioner Precincts 1 and 2. Black and Hispanic voting-age population in Precinct 1 increased from approximately 59.8% to 70.5%, while Black and Hispanic voting-age population in Precinct 2 decreased from approximately 49.4% to 41.2%. Precinct 1's Anglo voting-age population simultaneously declined

approximately 12 percentage points, while Precinct 2's Anglo voting-age population increased approximately 10.3 percentage points. The redistricting thereby changed Tarrant County from a county containing two majority-minority Commissioner precincts to one containing only one majority-minority Commissioner precinct.

32. When the County subsequently revised its 2026 Election Day voting plan, it added exactly 48 locations—12 to each of the four Commissioner precincts—and County officials expressly cited “balancing” the Commissioner precincts as a justification for the allocation. Thus, the County's asserted neutral benchmark for “balance” was not a preexisting or immutable geographic division of the electorate. It was the product of boundaries the same Commissioners Court had substantially redrawn the preceding year, concentrating Black and Hispanic voters in Precinct 1 while substantially reducing their proportion in Precinct 2.

33. Moreover, numerical equality in the number of polling places among Commissioner precincts does not establish equality of voting access. Equal numbers of polling locations can impose materially unequal burdens where the precincts differ in population distribution, poverty, vehicle availability, population density, historical polling-place utilization, public transportation, and the geographic concentration of Black and Hispanic voters. The County's own published Vote Center methodology recognizes minority population and transportation access as relevant considerations. Yet the County has identified no consistent application of those criteria explaining why an equal allocation of additional sites among the four recently redrawn Commissioner precincts should supersede the actual voting-access needs of the communities within those precincts.

34. The sequence of events is probative. The County first materially altered Commissioner precinct boundaries in a manner that concentrated Black and Hispanic voters into Precinct 1 and

reduced their proportion in Precinct 2; it then substantially reduced the County's Election Day voting locations; and when challenged, it allocated additional locations according to an equal-per-Commissioner-precinct formula based upon those newly created boundaries rather than demonstrated voter-access needs. Considered together with the County's departures from its stated Vote Center methodology, its failure to follow the mandatory procedures alleged herein, and the disproportionate elimination of voting locations in heavily Black and Hispanic communities, these facts support Plaintiffs' allegation that "balancing" Commissioner precincts does not explain the challenged decisions and is strong evidence of discriminatory purpose.

35. A comparison of the 2022 Election Day sites against the 2026 approved list shows that of the 316 locations Tarrant County used in 2022, 164 were kept at the same address, four others have an effectively identical replacement within a few hundred feet, seven have something nearby within a quarter of a mile and the remaining 141 have no replacement within a quarter mile in any direction. The net change is 92 but the disruption is 141.

36. Ms. Peoples and Ms. Maryellen Hicks, both Black, reside in zip code 76103, which is 78.7% nonwhite, and 76% Black or Hispanic. The adopted plan eliminates all of the voting sites in this zip code. In 2022, there were 892 votes cast in this zip code.

37. Kathleen Hicks is a Black voter who resides in the 76111 zip code where the population is 75.7% non-white, with 71% being Black or Hispanic. The County is eliminating 4 out of 7 polling sites in this zip code, despite there being 1,605 votes cast in 2022, putting a 133% increase in pressure on the remaining site with accompanying longer lines, longer commutes and lower voter turnout.

38. Ms. Rodriguez is an Hispanic voter who resides in the 76164 zip code where the population is 95% non-white, with 94.1% being Black or Hispanic. The County is eliminating 2 out of 3

polling sites in this zip code, despite there being 1,028 votes cast in 2022, putting a 133% increase in pressure on the remaining site with accompanying longer lines, longer commutes and lower voter turnout.

39. These injuries are imminent because the County intends to conduct the November 3 election under the adopted plan. A later damages award cannot restore an opportunity to cast a ballot in that election. Plaintiffs seek relief before election preparations make additional accessible sites impracticable.

VI. EQUAL RIGHTS AND QUALIFIED SUFFRAGE—RACIAL AND ETHNIC DISCRIMINATION

40. Plaintiffs incorporate paragraphs 1–27. Article I, § 3 of the Texas Constitution guarantees equal rights; article VI, § 2 protects the status of qualified voters. Government officials may not intentionally assign materially unequal voting access on account of race or Hispanic ethnicity. Plaintiffs seek prospective relief under article I, § 29 and the equitable remedies referenced herein.

41. Black and Hispanic plaintiffs reside in the areas specified above. The challenged selections increase their journey, time, or risk of being unable to vote as detailed above. The County knew of these consequences yet selected sites in a manner that eliminated voting locations for minorities.

42. The specific facts asserted above demonstrate the change in access for resident voters by race and Hispanic origin and from which there is a reasonable inference of both disparate impact and discriminatory purpose.

43. Defendants' implementation of a plan producing that unequal access, without a justification adequate under the Texas Constitution, violates plaintiffs' rights. Plaintiffs request a declaration of their rights and an injunction requiring a lawful site plan that remedies the proven access burden.

VII. QUALIFIED SUFFRAGE AND EQUAL RIGHTS—BURDENS ON VOTERS

GENERALLY

44. Plaintiffs incorporate paragraphs 1–27. All qualified voters, whatever their race or political affiliation, have a protected interest in a meaningful opportunity to vote under Texas Constitution article VI, § 2 and article I, §§ 3 and 19. This claim concerns actual barriers to casting a ballot, not an entitlement to vote at a preferred building or to preserve the historical number of centers.

45. The burdens on those in the locations identified above include added driving time, limited vehicle access, likely wait times based on capacity, and work or disability constraints. Defendants’ asserted interests may include availability, ADA compliance, staffing, equipment, cost, security, and avoiding clustering. The Court should weigh those documented interests against the proven burdens and feasible, timely alternatives under Texas constitutional principles. The requested relief is limited to articulated deficiencies and does not presume that every closed 2022 facility can be reopened.

VIII. ELECTION CODE VIOLATIONS

46. Plaintiffs incorporate paragraphs 1–44. Election Code § 43.007 requires the Tarrant County Commissioners Court to formally adopt a methodology for eliminating polling sites for the November 3, 2026 election. What the Court appears to have done in August and September 2026 was consider and ultimately approve particular lists of Election Day and early-voting locations without having complied with § 43.007.

47. In 2019, a Citizens Advisory Committee appears to have recommended a methodology for selecting polling sites to be eliminated. There is no evidence that the Commissioners Court formally adopted such methodology as required or adopted a new methodology.

48. The available meeting records characterizes the Commissioner's Court action as "Election Day voting sites for November 3, 2026 general election" and "Early voting sites," rather than an adoption of a location-selection methodology. The advisory committee developed and recommended a methodology, but the governmental body responsible for selecting countywide polling places never adopted the methodology required by §43.007(f).

49. Alternatively, Tarrant County had an adopted § 43.007(f) methodology through the 2019 CAC, but in 2026 selected polling locations through criteria materially different from the adopted methodology without formally amending or replacing it.

50. Additionally, § 43.007(h) requires the County, "in adopting a methodology under Subsection (f)," to solicit input from organizations or persons representing minority voters." There is no evidence of §43.007(h) minority-voter input associated with either adoption of the CAC methodology or adoption of a new methodology. These violations are relevant not only to Plaintiffs' claim under the Election Code but also to Plaintiffs' claim of intentional discrimination. The County's departure from mandatory statutory procedures governing the selection and elimination of polling locations is probative evidence of discriminatory purpose. *Village of Arlington Heights v. Metropolitan Housing Development Corp.*, 429 U.S. 252, 267 (1977). Here, the procedural departures are especially probative because § 43.007(h) specifically requires minority-voter input in connection with adoption of the methodology. The County's failure to comply with a statutory procedure expressly requiring minority participation, followed by a substantial reduction in voting locations alleged to burden Black and Hispanic voters disproportionately, is part of the totality of circumstantial evidence from which discriminatory intent may reasonably be inferred.

51. Defendants violated § 43.007 as described. Plaintiffs face the threatened injury described above. Section 273.081 authorizes appropriate injunctive relief against an Election Code violation; the implementing officials may also be enjoined from acting outside their lawful authority.

52. The evidence of discriminatory purpose is not limited to the statistical impact of the County's decisions or its departures from established procedures. Statements by the officials responsible for those decisions are also relevant to determining whether the County's asserted race-neutral explanations accurately describe its actual motivations. County Judge Tim O'Hare, a principal participant in the challenged decisions, has publicly stated, in substance, that "if you're a Republican officeholder and you haven't been called a racist, then you probably haven't done a thing." The statement is relevant because it reflects O'Hare's expressed view that accusations that governmental action is racially discriminatory are an expected—and even affirmative—consequence of taking governmental action consistent with his political objectives. It therefore bears upon the weight and credibility to be afforded the County's contention that race played no role in the challenged decision-making.

IX. APPLICATION FOR TEMPORARY RESTRAINING ORDER AND TEMPORARY INJUNCTION

53. Plaintiffs request an expedited evidentiary hearing. Their probable right to relief rests on the particular facts and claims established above, and their probable imminent irreparable injury is loss of a meaningful voting opportunity on November 3 that cannot be remedied afterward. The balance of harms and public interest favor a timely, administrable correction supported by verified site availability, accessibility, staff, equipment, and voter notice.

54. The proposed order should require the officials with legal authority to approve and operate identified additional compliant Election Day centers by a feasible date, and direct adequate public

notice. Alternatively, the Court should set an immediate temporary-injunction hearing and require Defendants to present the authoritative adopted roster, site capacity and availability data, the applicable methodology and deviations, and a feasible remedial proposal. Plaintiffs do not request cancellation of the election.

55. Plaintiffs ask this Court to issue an Order requiring the County to adopt a methodology that complies with § 43.007(f); solicit the minority-voter input required by § 43.007(h); apply that methodology to the November 2026 countywide polling-place selections; reconsider the 224-site list pursuant to the lawfully adopted methodology; and adopt a compliant final list sufficiently before Election Day to permit proper notice and election administration.

56. If the Court holds a hearing on a temporary restraining order in this Election Code action, Plaintiffs request compliance with Election Code § 273.082: electronic notice to the Attorney General as soon as practicable, the required one-hour interval unless waived by the Attorney General, and an opportunity for remote participation. Plaintiffs will submit a proposed order satisfying Texas Rules of Civil Procedure 680 and 683 and will address security under Rule 684.

X. PRAYER

Plaintiffs ask that Defendants be cited to appear and answer, and that the Court:

A. Set an expedited hearing and, on sworn proof, grant the specific temporary restraining and temporary injunctive relief described above;

B. requiring the County to adopt a methodology that complies with § 43.007(f); solicit the minority-voter input required by § 43.007(h); apply that methodology to the November 2026 countywide polling-place selections; reconsider the 224-site list pursuant to the lawfully adopted methodology; and adopt a compliant final list sufficiently before Election Day to permit proper notice and election administration;

C. Declare that Defendants have violated the rights of Black and Hispanic Voters in violation of the Texas Constitution and the Texas Election Code;

D. Declare the parties' rights under the particular Texas constitutional provisions established at trial and, if pleaded on verified facts, Election Code § 43.007

E. Permanently enjoin implementation of any part of the site plan proved to impose the pleaded unlawful access burdens, and direct a feasible lawful remedy administered by the officials with authority;

F. Order Defendants to restore the 92 voting sites eliminated by Defendants;

G. Award taxable costs and any attorney's fees only if a specific, applicable statutory basis is established and pleaded; and

H. Grant further equitable relief to which Plaintiffs prove entitlement.

Respectfully submitted

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